

(Del. Rev. 11/14) Pro Se General Complaint Form

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ANDRE El-Jihad: Bey
183 Aragon Drive
Mercoille Del 19720
 (In the space above enter the full name(s) of the plaintiff(s).)

2022 AUG -5 PM 4:06

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

22 - 1039 -

Civ. Action No. _____
 (To be assigned by Clerk's
 Office)

-against-

GDI SERVICES Inc.
500 Island Hercules Rd.
Wilmington, Del 19808
 (In the space above enter the full name(s) of the defendant(s).
 If you cannot fit the names of all of the defendants in the
 space provided, please write "see attached" in the space
 above and attach an additional sheet of paper with the full list
 of names. The names listed in the above caption must be
 identical to those contained in Section I. Do not include
 addresses here.)

COMPLAINT
 (Pro Se)

Jury Demand?

☐ Yes☒ No

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

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I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

By Andrea El-Saad
Name (Last, First, MI)

103 Halcyon Dr.
Street Address

Newcastle
County, City

DE
State

19720
Zip Code

302 310-7347
Telephone Number

E-mail Address (if available)

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

Name (Last, First)

Street Address

County, City

State

Zip Code

Defendant 2:

Name (Last, First)

Street Address

County, City

State

Zip Code

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Defendant(s) Continued

Defendant 3:

GDI

Name (Last, First)

Suite 115 780 Biltm Avenue

Street Address

King of Prussia Pennsylvania 19406

County, City

State

Zip Code

Defendant 4:

GDI - Luis Cruz

Name (Last, First)

Street Address

County, City

State

Zip Code

II. BASIS FOR JURISDICTION*Check the option that best describes the basis for jurisdiction in your case:*

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☒ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☒ **Federal Question:** Claim arises under the Constitution, laws or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

"~~Plaintiff~~ ^{Plaintiff} ~~has not~~ ^{with} proper notice or Acknowledgment of Termination Default to ~~placis~~ ^{placis} with contract, Partial Partial to Local Union 5010 Local 3755 left with NO RESPONSE; During Nation Crisis - abandoned contract to employee according to GDI policy." Page 3 of 8

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III. VENUE

This court can hear cases arising out of the Counties of New Castle, Kent, and Sussex in the State of Delaware.

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

*This venue is for the purpose
of federal law matter and/or
Constitution Rights for Labor
of State.*

IV. STATEMENT OF CLAIM

Place(s) of
occurrence:

*located site
500 Ashland ~~Highway~~ Rd
Wilmington DE.*

Date(s) of occurrence:

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

What
happened to
you?

*Gloria Folkes - Manager
Luis Cruz - Director Manager
G.D.I H.R. Director*

*Gloria Folkes - is the ~~current~~ manager
of my employment and witness
to Luis Cruz, MS Management*

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and Transfer to DO Ashland Hercules Rel
where I was told that my employ-
ment will be continued at this
particular site because they didn't
Require COVID - Test or Shot according
to Mandate as the Company of
Agilent Required for there Building
and personal Employees.

All was transferred to Ashland Hercules
site, where I was now told that
this would be my place of employment
By Glenn Fowler & L. HB BOSS -
LOUIS CRUZ - Field Director

Was anyone
else
involved?

I never personally HAD Direct
contact with Mr. LOUIS CRUZ only
Glenn Fowler my manager that
told me the Plaintiff.

LOUIS CRUZ never gave Formal Notice
of the 2nd Transfer after the
Reported grievance against a
Shift Supervisor - Mario - 500: Exhibits
of Notices with the mailer Attached.

The explain Exhibits would show
proper notification to Federal Court, which
leads to only believe in
A "Constructive" Wrongful Termination.

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Without Following the Existing Contract and for Policies of Agreement upon Employment Bill. GDT services and Part and Partial to SBU Local 32BJ.

The Field Rep. Mackenzie Bernhart 484-213-9909 was at the site of the illegal transfer without notice to Local 32BJ for the purposes of Employment. All done by Director Field Manager Luis Cruz.

Who did
what?

To whom called H.R. Department spoke to Kayleigh Butler and she told me. After she received my via mail and call, required to sit and wait until Luis Cruz the Field Manager who was supposed to contact me for proper Employment or that it would be a leave do to hostile work area, coming from the complaint or grievance sent to the GDT H.R. Director Mrs. Fuller, who told me to wait for the call from the Field Director - Luis Cruz - who never responded back in a timely manner. All parties are put on notice of "Breach of Contract."

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V. INJURIES

If you sustained injuries related to the events alleged above, describe them here.

All Personal Bills and ongoing existing contracts of other parties, was established and Based on my Employment to meet my daily transactions for personal Living. The Default by GDF Services, Delayed All. I am in a Foreclosure program that was establishing credit to carry my mothers Probate state. The delays and Default put me in Considerable Debt. And to Help take care of An Elderly that depended on me for Food, shelter, and care.

VI. RELIEF

The relief I want the court to order is:

- ☐ Money damages in the amount of: \$ 30,000
- ☐ Other (explain):

Because Everything was in a good Alignment with my finances; Before the Default of GDF's incompetent management of Discrimination; After Reporting the Grievance to HR. I should Receive this because I had to supplement with another job which monies was sent to cover damages of Late fees and Penalties which places me more Behind and Debt, and monies that I would have made if still there today, if the problem didn't exist with Time in Covid-19

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VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Dated

Plaintiff's Signature

Printed Name (Last, First, MI)

Address

City

State

Zip Code

Telephone Number

E-mail Address (if available)

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.